

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA : X
-v.- :
STEPHEN M. CALK, :
Defendant. :
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NOTICE OF MOTIONS IN LIMINE

PLEASE TAKE NOTICE, that based upon the accompanying memorandum of law, the United States of America, by and through its undersigned counsel, hereby respectfully moves this Court *in limine* for orders (1) excluding the testimony of the defense expert Dr. Andrew Carron; (2) precluding evidence or argument that the quality of the loans, or fraud against the defendant, are defenses to the charged bribery offense; (3) precluding evidence or argument concerning the defendant's prior commission of "good acts"; (4) precluding evidence of irrelevant facts intended to elicit juror sympathy; and (5) precluding evidence or argument that the charges against the defendant are politically or otherwise improperly motivated.

The Government respectfully requests oral argument on its motions.

Dated: New York, New York
October 23, 2020

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/
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